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March 21, 2000



Charter Member

Department of the Army
Walla Walla District Corps of Engineers
Attention: Lower Snake River Study
201 North Third Avenue
Walla Walla, Wa 99362-1876

To: Commander, Lower Snake River Study

1) I am a forester who manages land for F.H. Stoltz Land & Lumber a privately owned timber company in Northwest Montana. The purpose of my writing is to provide comments and recommendations on the Lower Snake River Juvenile Salmon Migration Draft Feasibility Report/ Environmental Impact Statement.

2) First off I'd like to say "ESSAYONS", keep on trying. The current process seems to be working; hundreds of thousands of juvenile salmon make it to the lowest dam every barge trip. A new National Marine Fishery Service (NMFS) report shows that survival of the fish through each dam is 95%. Great job on the Corps part !!! It is very discouraging to see that breaching of the lower dams is even an option. It would take at least eight years to get through congress on other litigation until the dams could be breached, then it would take many many years of work and cleaning of the rivers till solmonids (trout and salmon) would even benefit from a breach. This thought is unacceptable and has no evidence of even helping. A better option is to improve the existing situation. Currently the dams harness a renewable resource that brings abundant and cheap electrical power for homes and business and has turned arid desert lands into productive crop lands that provide food and jobs for the world, it provides waterways in the Columbia River Basin for bringing products up and down stream, and provides flood control for communities, irrigation for agricultural lands, and provides a myriad of recreational opportunities

Flathead Valley



Co-founder



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3) The level of environmental impacts resulting in breaching the lower dams is unacceptable. Why should we smother an already existing problem with another one? Salmon are already on the brink of extinction. It is not reasonable to bet their survival on a single unproven theory. What we need to look at is what we don't know to build a recovery strategy that works. Breaching takes a leap of faith that is not reasonable. We do know that up to 75 million tons of sediment will wash down the Snake and Columbia Rivers if the four dams are breached. That will destroy salmon and resident species as well. About 14,000 acres of land would be drained and exposed. This will have short-term impacts on wildlife and could result in increased erosion since there will be no plant life to stabilize the banks. Replacing lost hydropower with natural gas turbines will put millions of tons of carbon dioxide in the atmosphere to pollute or clean air.

4) I recommend continuing present operations and ongoing improvements to the system, with roughly the existing annual level of investment continuing into the future. The barriers that dams created have been bypassed by fish and are increasingly becoming less of a burden on fish. Adult fish are making it upstream to spawn and juvenile fish are successfully making it downstream. There is however some more room for improvement to increase numbers. Some measures such as surface bypass systems for juvenile fish to increase dam passage survival should be considered for certain areas. Also the use of improved technology can be used such as; extended length fish screens, barging and trucking, turbine improvements, improved spill lips and other measures **short of dam breaching and augmentation flows** to help fish migration. It is important to not decrease power production and drive up power costs that many Americans have a hard time funding already.

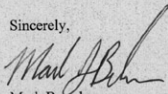
5) I think that a moderate increase in effort to protect and restore habitat can help juvenile salmon. An important note is not to decentralize habitat decisions from local decision-makers and **not to effect private land rights**. Habitat approaches need to concentrate on decentralizing habitat decisions and let local decision-makers decide on projects. Upland habitat is not effecting fish populations and migration. States currently have in place effective habitat conservation plans for upland management. For example in Montana we have the Streamside Management Zone law and Best Management Practices (BMP) that mandate timber harvesting activities. These laws and practices are effective and allow our forests to work as collectors, filters and distributors of clean water on which plants, animals and humans depend on. Low water flows can strand fish and/or cause water temperatures to increase, thus increasing fish diseases and mortality. Timber harvesting increases water flows to a much more natural flow that mimics pre-European establishment of the West or pre-fire suppression. Therefore timber harvesting is in all reality good for fish when adequate laws and BMP's are followed. Some improvements in urban runoff from residential and industrial development can be made, but again these

decisions can be made on a local level with some guidance and education from federal agencies. A lot of studies show ocean conditions including currents and temperatures can affect salmonids. During dry and warm periods populations are down. Periods of cool and wet increase populations. More research and publication needs to be done in the area of habitat.

6) Harvest impacts on listed populations need to be reduced to conservation crisis levels for ten years after which a shift could be implemented based on populations. I do believe that low fish populations are due to over harvesting of fish and harvest levels shouldn't be increased. Commercial fishing in the lower Columbia River using gillnets should completely stop. The sport fishing out on the coast isn't as critical of an impact on the overall issue, however limiting numbers of take is definitely an alternative. Native American usage of salmonids needs to reflect the crisis situation that everyone is reacting to. Tribal governments need to be an active participant and be willing to participate in recover even if this means drastically reducing take, especially for sale.

7) In conclusion I'd like to say thank you for allowing me the opportunity to comment and that overall I recommend minor changes that don't affect private property rights and most of all doesn't include breaching of any dams.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mark Boardman", with a stylized flourish extending from the end.

Mark Boardman
Forester